

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
BLUEFIELD DIVISION**

**WEST VIRGINIA HIGHLANDS  
CONSERVANCY, APPALACHIAN  
VOICES, and THE SIERRA CLUB,**

**Plaintiffs,**

**v.**

**Civil Action No. 1:19-cv-00576**

**BLUESTONE COAL CORPORATION,**

**Defendant.**


**JOINT MOTION TO ENTER FIRST ADDENDUM TO THE CONSENT DECREE**

Pursuant to Paragraph 40 of the Consent Decree in this action (CM/ECF #115), Plaintiffs and Defendant jointly request that the Court sign and enter the attached First Addendum to the Consent Decree, for the reasons set forth in that addendum.

Respectfully submitted,

/s/ Derek O. Teaney

DEREK O. TEANEY (WVBN 10223)  
APPALACHIAN MOUNTAIN ADVOCATES, INC.  
PO Box 507  
Lewisburg, WV 24901  
Telephone: (304) 793-9007  
Email: dteaney@appalmad.org  
*Counsel for Plaintiffs*

  
BENJAMIN BRYANT (WVBN 520)  
CAREY, DOUGLAS, KESSLER & RUBY, PLLC  
PO Box 913  
Charleston, WV 25323  
Telephone: (304)345-1234  
Email: sbbryant@cdkrlaw.com  
*Counsel for Defendant*